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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Judy Beaumont,

Plaintiff,

v.

US Department of Homeland Security,
et. al.,

Defendants.

Case No. 2:18-cv-00393-APG-CWH

**Stipulation for Stay
(First Request)**

The parties, through their counsel of record, hereby stipulate to stay this matter for a period of 60 days, or until **February 11, 2019**. The parties are in active settlement negotiations and believe they will be able to resolve this matter without continued litigation. This is the first request to stay this matter, and the stipulation is not sought for purposes of delay or any other improper purpose. Rather, the parties request a stay to permit them to focus their time and resources on settlement discussions.

While the parties are optimistic they will be able to resolve this matter, they reserve the opportunity to request an early settlement conference with either the assigned magistrate judge or another magistrate judge, as determined by the Court, should they be unable to resolve this matter during the course of the stay. To that end, the parties' request that the Court schedule a status conference, to be automatically vacated in the event of resolution, shortly after expiration of the stay. In advance of the status conference, the parties will submit a joint status report indicating whether an early settlement conference would be beneficial or proposing new discovery deadlines.

1 **WHEREFORE**, the parties respectfully request that this stipulation be granted and
2 the case stayed until **February 11, 2019**, and that the Court set a Status Conference, at a
3 time and date convenient to the Court, shortly after expiration of the stay.

4 Respectfully submitted this 13th day of December 2018.

5 THE COTTLE FIRM

6
7 /s/ Matthew G. Holland
8 MATTHEW G. HOLLAND, ESQ
9 8635 S. Eastern Avenue
10 Las Vegas, NV 89123

11 *Attorney for Plaintiff*

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12 /s/ Mark E. Woolf
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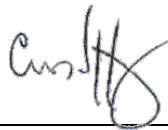
15 *Attorneys for the United States*

16 CHRISTOPHER M. YOUNG, PC

17 /s/ Christopher M. Young
18 CHRISTOPHER M. YOUNG, ESQ.
19 2460 Professional Court, #200
20 Las Vegas, NV 89128

21 *Attorney for Clark County*

22 **IT IS SO ORDERED:**

23 

24 **~~UNITED STATES DISTRICT JUDGE~~**
25 **UNITED STATES MAGISTRATE JUDGE**

26 **DATED:** December 17, 2018
27 _____